

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

DOCTORS COFFEY INTERNAL )  
MEDICINE & FAMILY CARE, LLC, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GRANGE INSURANCE COMPANY )  
a/k/a GRANGE MUTUAL CASUALTY )  
COMPANY, )  
 )  
Defendants. )

Docket No.: 3:21-cv-00008-TAV-HBG

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**PLAINTIFF'S RULE 26(a)(1) SUPPLEMENTAL INITIAL DISCLOSURES**

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Comes now Plaintiff, Doctors Coffey Internal Medicine & Family Care, LLC, by and through counsel, pursuant to Fed. R. Civ. P. 26(e)(1), hereby serves these Supplemental Initial Disclosures to Defendants. Plaintiff has identified Rick Hammond, J.D., CLU as a potential expert witness. Rick Hammond is an expert in the areas of insurance bad faith claim investigations and his office is located at 650 Warrenville Road, Suite 100 Lisle, Illinois 60532. Defendant does not waive any objection that disclosure of information, electronically stored information, and tangible things are confidential, prepared in anticipation of litigation for trial by or for another party's representative, or otherwise privileged from disclosure under applicable Rules of Civil Procedure, Rules of Evidence, and other applicable law.

Respectfully submitted,

*/s/ Ashleigh Beer*

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing has been served by electronic mail according to FRCP 5 (b)(2)(E) to the following on this 21st day of January, 2022.

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Respectfully submitted,

*/s/ Ashleigh Beer*

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